

DIRECT TESTIMONY

OF

GEORGE LIGHT

ENGINEERING DEPARTMENT

TELECOMMUNICATIONS DIVISION

ILLINOIS COMMERCE COMMISSION

ICC ON ITS OWN MOTION

INVESTIGATION CONCERNING ILLINOIS BELL TELEPHONE COMPANY'S

COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT

OF 1996

DOCKET NO. 01-0662 (PHASE 1)

MARCH 2002

1   **Q.**   Please state your name and business address.

2

3   **A.**   My name is George Light. My business address is 160 North LaSalle Street,  
4       Suite C-800, Chicago, Illinois 60601.

5

6   **Q.**   By whom are you employed and in what capacity?

7

8   **A.**   I am employed by the Illinois Commerce Commission as an Engineering Analyst  
9       in the Telecommunications Division.

10

11   **Q.**   Please summarize your professional background and experience.

12

13   **A.**   My professional experience includes 13 years working in the commercial finance  
14       industry in various analytical and marketing positions, and 8 years working in the  
15       telecommunications industry. Those 8 years include 4 years with Pacific  
16       Telephone, in their network switching and consumer services departments, and  
17       most recently 4 years with NeuStar, working as part of the North American  
18       Numbering Plan Administration (NANPA). My experience with the NANPA  
19       included both central office code (NXX) administration as well as area code  
20       (NPA) relief planning.

21

22   **Q.**   What is the purpose of your testimony in this proceeding?

23

24 A. The purpose of my testimony is to address Ameritech Illinois' (AI or Company)  
25 compliance within the following Section 271 competitive checklist requirements:  
26 item 7, as it pertains to operator services and directory assistance (OS/DA);  
27 check list item 8, white page listings for competing carriers; checklist item 9,  
28 number administration; checklist item 11, local number portability (LNP); and  
29 checklist item 12, nondiscriminatory local dialing parity.

30  
31 Q. Please summarize your findings and recommendations.

32  
33 A. In my review of the requirements of checklist items 7 (access to OS/DA  
34 services), 8 (white pages directory listings for CLEC customers, and CLEC's  
35 access to white pages information), 9 (nondiscriminatory access to telephone  
36 numbers for assignment to other carriers), 11 (compliance with LNP  
37 requirements) and 12 (providing dialing parity to competing carriers accessing  
38 AI's network), it appears at this time that AI is in substantial compliance.  
39 However, final determination of AI's compliance with these checklist items'  
40 requirements cannot be made until the relevant three-month performance  
41 measurement data and OSS testing results, as applicable, have been reviewed.  
42 Although I am not aware at this point in this proceeding of any issue that may  
43 impact my assessment, I reserve my opinion on whether the requirements for  
44 these checklist items have been met until I have heard all of the evidence  
45 presented by the parties in both phases of this proceeding.

**Checklist Item 7 – OS/DA**

**Q.** What are the requirements of checklist item 7?

**A.** Checklist item 7 requires that AI provide CLECs with nondiscriminatory access to 911 and E911 services, as well as nondiscriminatory access to its OS/DA services. In my testimony, I will address that portion of item 7 that pertains to nondiscriminatory OS/DA access. Staff witness Rick Gasparin's testimony will address nondiscriminatory access to 911 and E911 services.<sup>1</sup>

**Q.** Please provide a summary of those items.

**A.** Within item 7, I will be discussing the following areas: 1) implementing "branding" for OS/DA in a timely manner when a customer moves its service from AI to a CLEC, or from one CLEC to another CLEC; and 2) providing operator services and directory assistance as unbundled network elements until such time as AI demonstrates that CLECs have the ability to route their OS/DA traffic to their own or to a third party OS/DA platform.

**Q.** Can you briefly describe "branding," as it pertains to OS/DA?

**A.** Yes. When AI operators are used to provide OS/DA to CLEC customers, branding allows the operator to be identified as the CLEC. In other words, when

70 the customer's call is answered, the operator is identified as the CLEC operator,  
71 as opposed to being identified as being from AI.

72  
73 **Q.** AI witness Rogers' testimony indicates that contrary to CLECs' assertions it takes  
74 less than five business days from the time a customer has migrated its service to  
75 a CLEC before their OS/DA is properly branded. Please comment.

76  
77 **A.** According to the testimony provided by Jan D. Rogers, in late 2001 AI refined its  
78 branding capability. AI now utilizes information from its Line Information  
79 Database (LIDB) to trigger branding.<sup>2</sup> Ms. Rogers' testimony asserts that this  
80 change renders concerns about a possible five-day interval for changing  
81 branding "irrelevant." She does not however, provide any information about  
82 timeframes for branding pursuant to the new methodology. Nevertheless, the  
83 issue relevant to AI's compliance with this Section 271 requirement is not the  
84 branding time interval per se, but rather, that the branding time interval for  
85 Ameritech customers migrating to CLECs is at parity with the time interval for  
86 customers migrating from a CLEC to AI.

87  
88 **Q.** Is the branding time interval for Ameritech customers migrating to CLECs at  
89 parity with the time interval for customers migrating from a CLEC to AI?

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<sup>1</sup> ICC Staff Exhibit 8.0

<sup>2</sup> Ameritech Exhibit 9.0 at 6.

91 A. Ms. Rogers' testimony indicates that the process by which OS/DA branding  
92 changes are triggered is the same and implemented in the same time frame for  
93 both scenarios.<sup>3</sup>

94  
95 Q. Do you believe that AI is in compliance with the OS/DA requirements set forth in  
96 this checklist item?

97  
98 A. Based on the information available to Staff to date in this docket, AI appears to  
99 be in compliance with the non-rates aspect of OS/DA requirements for this  
100 competitive checklist item. As noted earlier, however, Staff witness Koch's  
101 evaluation of rate-related matters pertaining to this checklist requirement is  
102 necessary to complete this checklist item's assessment. Moreover, a definitive  
103 finding of AI's compliance with this checklist item cannot be made prior to an  
104 evaluation of the relevant three-month performance measurement data still to be  
105 submitted by the Company in support of its application as well as the result of the  
106 OSS test to be evaluated in the second phase of this proceeding. Although I am  
107 not aware at this point in this proceeding of any issue that may impact my  
108 assessment, I reserve my opinion on whether the requirements for this checklist  
109 item have been met until I have heard all of the evidence presented by the  
110 parties in both phases of this proceeding.

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112  

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<sup>3</sup> Id. at 7.

**Checklist Item 8 – White Pages Listings**

**Q.** What are AI's obligations regarding the publication of White Page listings?

**A.** Section 271(c)(2)(B)(viii) of the 1996 Telecommunications Act requires a Bell Operating Company (BOC) to provide white page listings for customers of other carriers' telephone exchange service.<sup>4</sup> This is accomplished by AI ensuring that its directory publishing affiliate (DonTech) publishes and integrates the primary listings of a CLEC customer located within the geographic area covered by a directory serving AI's customers. The FCC indicated that the listings are to include the subscriber's name, address and telephone number.<sup>5</sup> Further, the FCC "held that a BOC satisfies the requirements of checklist item 8 by demonstrating that it: (1) provides nondiscriminatory appearance and integration of white page directory listings to competitive LECs' customers; and (2) provides white page listings for competitors' customers with the same accuracy and reliability that it provides its own customers."<sup>6</sup>

**Q.** What processes does AI have in place for maintaining the White Pages (WP) database?

**A.** According to testimony submitted by Robben Kniffen-Rusu (AI Exhibit 8.0, pg. 4) AI Illinois provides two electronic interfaces for the submission of information to

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<sup>4</sup> 47 U.S.C. § 271(c)(2)(B)(viii).

<sup>5</sup> Connecticut 271 Order, Appendix D, para. 61.

be included in the WP database. In addition, partial and fully manual systems are also available.

**Q.** How is the accuracy and reliability of the WP listing information verified?

**A.** AI's TCListLink system allows CLECs to review and verify their retail subscribers' WP listing data. (Kniffen-Rusu, Ex. 8.0, pg. 4.)

**Q.** Is this the same verification tool that AI utilizes for its retail customers?

**A.** Yes.

**Q.** If a CLEC has verified that its customer's listing information is correct in TCListLink, can it always presume that this information is being reflected correctly in the Directory Assistance (DA) database?

**A.** In general, yes. According to the testimony provided by Kniffen-Rusu, the WP database downloads nightly into the (DA) database.<sup>7</sup> AI's successful completion rate for WP database downloads to the DA database during 2001 was 97.7%. The remaining 2.3% resulted in at least a one-day delay.

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<sup>6</sup> Id. at 61.

<sup>7</sup> Ameritech Ex. 8.0 at 5.



156 **Q.** Do you believe that AI is in compliance with the requirements defined in this  
157 checklist item?

158  
159 **A.** Based on the information available to Staff to date in this docket, AI appears to  
160 be in compliance with the requirements for this competitive checklist item.  
161 However, a definitive finding of AI Illinois' compliance with this checklist item  
162 cannot be made prior to an evaluation of the relevant three-month performance  
163 measurement data still to be submitted by the Company in support of its  
164 application as well as the result of the OSS test to be evaluated in the second  
165 phase of this proceeding. Although I am not aware at this point in this  
166 proceeding of any issue that may impact my assessment, I reserve my opinion  
167 on whether the requirements for this checklist item have been met until I have  
168 heard all of the evidence presented by the parties in both phases of this  
169 proceeding.

170  
171 **Checklist Item 9 – Number Administration**

172  
173 **Q.** What are the requirements of checklist item 9?

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175 **A.** Checklist item 9 requires a BOC to provide “nondiscriminatory access to  
176 telephone numbers for assignment to the other carrier’s telephone exchange

service customers” until “the date by which telecommunications numbering administration, guidelines, plan, or rules are established.”<sup>8</sup>

**Q.** Is AI responsible for the assignment of telephone numbers (NXX codes) to other carriers?

**A.** At the time this requirement was defined, AI was the number administrator for Illinois. However, its responsibility for this function ceased in 1999.

**Q.** To whom did the responsibility transfer, and who is now responsible for the assignment of new NXX codes?

**A.** That responsibility now lies with NeuStar, acting in its role as the North American Numbering Plan Administrator. In 1998 and 1999, NeuStar assumed that function from all the dominant incumbent local exchange carriers in the United States. Although AI no longer acts in the role of Number Administrator, it is still responsible for translating competitors’ NXX codes into AI’s network. This function is important because it is necessary for call completion.

**Q.** What is the process for translations for new NXX codes within AI’s network?

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<sup>8</sup> 47 U.S.C. § 271(c)(2)(B)(ix).

198 A. When NeuStar assigns a new NXX code, the information is placed in Telcordia's  
199 Business Integrated Rating and Routing Database System (BIRRDs). This data  
200 is downloaded nightly to the carriers that subscribe to the service (including AI).

201

202 Q. What are the timelines for translating new NXX codes?

203

204 A. The timelines applying to new NXX codes are set forth in industry guidelines  
205 described in "Central Office Code Assignment Guidelines."<sup>9</sup> Generally speaking,  
206 a new NXX code becomes effective 45 days after it is published in Telcordia's  
207 databases.

208

209 Q. Does AI adhere to these guidelines?

210

211 A. As far as I can determine, based on evidence available to Staff to date, AI  
212 adheres to these guidelines.<sup>10</sup>

213

214 Q. Do you believe that AI is in compliance with the requirements defined in checklist  
215 item 9?

216

217 A. Based on the information available to Staff to date in this docket, AI appears to  
218 be in compliance with the number administration requirements under checklist  
219 item 9. However, a definitive finding of AI Illinois' compliance with this checklist

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<sup>9</sup> Developed and maintained by the Industry Numbering Committee (INC); [www.atis.org](http://www.atis.org)

<sup>10</sup> See Ameritech Ex. 5.0 at 15.

item cannot be made prior to an evaluation of the relevant three-month performance measurement data still to be submitted by the Company in support of its application. Although I am not aware at this point in this proceeding of any issue that may impact my assessment, I reserve my opinion on whether the requirements for this checklist item have been met until I have heard all of the evidence presented by the parties in both phases of this proceeding.

**Checklist Item 11 – Local Number Portability (LNP)**

**Q.** Please delineate the requirements of checklist item 11.

**A.** Section 271(c)(2)(B)(xi) of the 1996 Telecommunications Act requires a BOC to comply with the number portability regulations adopted by the FCC pursuant to Section 251. Section 251(b)(2) requires all LECs “to provide, to the extent feasible, number portability in accordance with requirements prescribed by the Commission.”<sup>11</sup> Pursuant to the FCC’s Number Portability First Report and Order, local exchange carriers (LECs) operating in the 100 largest MSAs (Metropolitan Statistical Area) must offer long term LNP<sup>12</sup>.

**Q.** How would you define LNP?

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<sup>11</sup> Connecticut 271 Order, Appendix D, para. 64.

<sup>12</sup> *First Report and Order and Further Notice of Proposed Rulemaking, Telephone Number Portability*, 11 FCC Rcd 8352, para 77.

240 A. LNP is the technology that allows a customer to change its telecommunications  
241 service provider without having to change its telephone number. LNP allows the  
242 customer to keep its existing number.

243

244 Q. Has AI fully implemented LNP?

245

246 A. Yes. AI witness Mondon indicates that AI has deployed LNP in all 395 of its local  
247 switches in Illinois.<sup>13</sup>

248

249 Q. Does this comply with FCC requirements for LNP deployment?

250

251 A. Yes. In fact, as I stated earlier, the FCC only requires LNP deployment in the top  
252 100 MSAs nationally. AI has gone beyond that requirement by equipping 100%  
253 of its access lines in Illinois with LNP capability.

254

255 Q. Do you believe that AI is in compliance with LNP requirements as defined in  
256 checklist item 11?

257

258 A. Based on the information contained in the Mondon affidavit, AI appears to be in  
259 compliance with the LNP requirements. However, a definitive finding of AI's  
260 compliance with this checklist item cannot be made prior to an evaluation of the  
261 relevant three-month performance measurement data still to be submitted by the

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<sup>13</sup> Mondon Affidavit at p 3, par. 5.

Company as well as the result of the OSS test to be evaluated in the second phase of this proceeding. Although I am not aware at this point in this proceeding of any issue that may impact my assessment, I reserve my opinion on whether the requirements for this checklist item has been met until I have heard all of the evidence presented by the parties in both phases of this proceeding.

**Checklist Item 12 – Local Dialing Parity**

**Q.** Please describe the requirements of checklist item 12.

**A.** Checklist item 12 requires a BOC to provide “[n]ondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of section 251(b)(3).”<sup>14</sup> What this means is that AI must maintain local dialing parity for competitors and other service providers that operate within its service area. Customers using a CLEC’s service must be able to access other numbers in the same manner as AI’s retail customers.

**Q.** Does AI Illinois provide local dialing parity to all CLECs operating within its territory?

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<sup>14</sup> 47 U.S.C. § 271(c)(2)(B)(xii).

284 A. Yes. AI does not require any CLEC to use access codes or additional digits to  
285 complete calls to AI customers nor are AI customers required to dial any  
286 additional digits to complete local calls to the customers of a CLEC.

287

288 Q. Do you believe that AI is in compliance with the requirements as they pertain to  
289 check list item 12?

290

291 A. Based on information available to Staff to date in this docket, AI appears to be in  
292 compliance with local dialing parity requirements. Although I am not aware at  
293 this point in this proceeding of any issue that may impact my assessment, I  
294 reserve my opinion on whether the requirements for this checklist item have been  
295 met until I have heard all of the evidence presented by the parties in both phases  
296 of this proceeding.

297

298 Q. Does this conclude your testimony?

299

300 A. Yes, it does.